

MDNR Appendix F - Section Specific Comment 127:Section 4.3.3.2,

Comment:

Toxins, page 8 - Lead is noted as not having reference dose listed in IRIS. Instead, EPA's Adult Lead Model (ALM) should be utilized for the industrial scenario. EPA's RSLs provide a screening level of 800 mg/kg. If a construction worker scenario is utilized, the ALM should be used for risk assessment purposes. Please note that the toxicological hierarchy as discussed in the EPA memorandum Human Health Toxicity Values in Superfund Risk Assessments, OSWER Directive 9285.7-53 at the internet website

<http://www.epa.gov/oswer/riskassessment/pdf/hhmemo.pdf> must be utilized.

Discussion:

EPA's lead model (ALM) will be used to calculate blood levels in remediation workers that might be in close contact with RIM during construction of the alternatives.

Proposed Text Change:

Text following text has been added to the ROD Remedy short term risk discussion:

“Blood levels of lead were also calculated for remediation workers exposed to soil using EPA's Adult Lead Methodology (ALM). For a soil concentration of 479 µg/g and an exposure duration of 111 days, the blood lead level in the hypothetical remediation worker was calculated to be 1.7 µg/dL (17% of the target level of 10 µg/dL). The risk that the blood level in a fetus carried by that remediation worker would exceed its target blood level was calculated to be approximately 0.1%, which is well below the target percentile of 5%.”

Similar text has been added to the short term risk assessments for the two “Complete Rad Removal” alternatives.

EPA FEEDBACK:

EPA accepts this response and the proposed text changes.